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22 Attorneys for Defendant Amazon Logistics, Inc.,

23 incorrectly sued as AMAZON.COM, LLC

24 **UNITED STATES DISTRICT COURT**

25 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO**

26 JASMINE MILLER, individually and on
27 behalf of all others similarly situated,

28 Plaintiff,

1 v.

2 AMAZON.COM, LLC, a Delaware
3 Limited Liability Company; and DOES 1
4 through 500, inclusive,

5 Defendants.

6 Case No. 17-CV-03488-MMC

7 **CLASS ACTION**

8 **JOINT STIPULATION TO VACATE
9 FEBRUARY 14, 2020 CASE
10 MANAGEMENT CONFERENCE AND
11 STAY CASE PENDING SETTLEMENT;
12 DECLARATION OF J. JASON HILL IN
13 SUPPORT [Civ. Local Rule 6-2]**

14 **[PROPOSED ORDER SUBMITTED
15 SEPARATELY HEREWITHE]**

16 Complaint filed: April 11, 2017

17 Removal date: June 15, 2017

18 Trial Date: None set

1 **LAW OFFICES OF RONALD A. MARRON, APLC**

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9 on behalf of all others similarly situated

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This Stipulation is entered into by and between Plaintiff Jasmine Miller (“Plaintiff”) and Defendant Amazon Logistics, Inc. (incorrectly sued as Amazon.com LLC) (“Defendant”) (together as “the Parties”), by and through their respective counsel, for an Order vacating the February 14, 2020 Case Management Conference and staying this matter pending settlement.

The Parties attended a mediation in San Francisco with Tripper Ortman on September 18, 2019. On October 1, 2019, the Parties reached an agreement in principle to settle this case and are currently meeting and conferring regarding a draft settlement agreement.

As the contemplated settlement encompasses not only the claims in this matter but also claims in a related PAGA action filed by Plaintiff Miller that is pending in Alameda County Superior Court (Case No. RG17856888), the Parties have agreed to amend the complaint in the PAGA action to add the claims herein so that the Alameda Superior Court can process the settlement encompassing the claims in both actions. As such, the Parties would like this action stayed pending the settlement in the PAGA action.

IT IS STIPULATED AND AGREED by the Parties, and the Parties respectfully request the Court vacate the February 14, 2020 Case Management Conference and stay this action for approximately 6 months, to August 7, 2020, at which time the Parties will file a statement updating the Court on the status of the settlement pending in the PAGA action.

IT IS SO STIPULATED.

Dated: February 7, 2020

COHELAN KHOURY & SINGER

By /s/ J. Jason Hill
J. Jason Hill
Attorneys for Plaintiff JASMINE MILLER

Dated: February 7, 2020

MORGAN, LEWIS & BOCKIUS LLP

By /s/ Tuyet T. Nguyen
John S. Battenfeld
Brian D. Fahy
Tuyet T. Nguyen
Attorneys for Defendant AMAZON.COM LLC

Attestation Regarding Signatures

I, J. Jason Hill, attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: February 7, 2020

COHELAN KHOURY & SINGER

By /s/ J. Jason Hill

J. Jason Hill

Attorneys for Plaintiff JASMINE MILLER

DECLARATION OF J. JASON HILL

1. I am partner at Cohelan Khoury & Singer, co-counsel for Plaintiff Jasmine Miller (“Plaintiff”) in the above-captioned matter. I am licensed to practice law in the State of California and this Court. I have personal knowledge of the following facts and, if called to testify in this matter, I could and would testify competently to the matters stated herein.

2. I submit this declaration pursuant to Local Rule 6-2 in support of the Parties' stipulation and request for an order vacating the February 14, 2020 Case Management Conference and staying this matter for six (6) months.

3. The Parties herein attended a mediation on September 18, 2019. On October 1, 2019, the Parties reached an agreement in principle to settle this case and are currently meeting and conferring regarding a draft settlement agreement.

4. As the contemplated settlement encompasses not only the claims in this matter but also claims in a related PAGA action filed by Plaintiff Miller that is pending in Alameda County Superior Court (Case No. RG17856888), I determined, and Defense counsel agreed, that the most efficient way to process the settlement and conserve judicial resources would be to amend the Complaint in the PAGA action to include the claims herein so that the Alameda Superior Court can process the settlement of the claims in both actions.

5. The Parties have met and conferred and believe that vacating the Case Management Conference and staying this action until the settlement in the PAGA action has been processed will not cause any undue prejudice to either party.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 7th day of February, 2020 at San Diego, California.

/s/ *J. Jason Hill*

J. Jason Hill